

## **REMARKS**

1. The Examiner's reconsideration of the application is urged in view of the amendments above and the arguments presented below.
2. Rejections of claims 1, 3, 4, 7-18 and 21 and the rejection of claim 6 under 35 USC § 103:

In the Office Action, page 2, point 3, claims 1, 3, 4, 7-18 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Booth, Jr. et al. (USPgPub 2003/0043088) in view of Oguchi et al. (USPN 6340976). Reconsideration is requested.

In addition, in the Office Action, page 6, point 4, claim 6 was stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Booth in view of Oguchi and further in view of Kojima et al. (USPN 6313806). Reconsideration is also requested.

Claim 1 has been amended by incorporating the feature of claim 6, i.e. the feature of "determining a target luminance for each virtual target primary such that all or substantially all of the real primaries are able to realize the target luminance of the corresponding virtual primary" so that new claim 1 corresponds to former claim 6 (which was dependent on claim 1).

Reconsideration is requested for the following reasons:

- a. According to MPEP 2145, X, C "Lack of Suggestion To Combine references" (page 2100-160), "...there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine reference teachings."

In accordance with the letter from Margaret Focarino, Deputy Commissioner for Patent Operations, dated May 3, 2007 it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements.

Booth teaches a compensation method for a display with organic light emitting devices. Color variations between sub-pixels of the same color are compensated based on the smallest color gamut which all the sub-pixels of that color can achieve.

Oguchi teaches a color calibration for a multi-vision system display consisting of a plurality of display units. The display color of a display unit is adjusted to a target color. This target color is obtained by calculating first the XYZ tristimulus value for each one of the display units and by calculating afterwards an average value for all representing colors. This calculated average value is set as the XYZ tristimulus value of the target color.

The compensation method of Booth is performed at the level of a sub-pixel while the calibration method of Oguchi is done at the level of a display unit.

No suggestion or motivation can be found in Booth or in Oguchi to modify the teachings of Booth by applying the calibration according to Oguchi at the level of a sub-pixel.

Such a suggestion or motivation cannot be found, either, in the knowledge generally available to one of ordinary skill in the art because the present invention is based on the finding by the inventors that it is possible to compensate completely color variations between sub-pixels of the same color outside the smallest color gamut (see the specification page 10, lines 20-25 and Fig. 3, the hatched areas A1, A2 and A3). This finding was not known at the time the present invention was made.

In the Office Action, page 4, 1st paragraph, the following statement is made in relation with the application of Oguchi's "new type of calculation method" in Booth's compensation method: "The new type of calculation method would be a different way of producing target values for the overall color gamut of a single display device of Booth rather than for multiple displays of Oguchi."

A "different" way cannot be considered to be a reasonable way to justify such a combination. It is not a suggestion or motivation to combine the teachings of different references. On top of that, in the present case, the target values obtained are different so that it seems far more logical to say that Oguchi discloses a way of producing different target values.

It must also be emphasized that Oguchi is not disclosing a fixed format emissive display device.

It is therefore apparent that the teachings of Booth and Oguchi cannot properly be combined.

- b. The feature, added in new claim 1 (former claim 6) is not disclosed in Kojima. According to this feature, a target luminance for each virtual target primary is determined such that all or substantially all of the real primaries are able to realize the target luminance of the corresponding virtual primary. However, Kojima discloses only that: "...the variation in luminous intensity (luminance) is corrected," which means that the luminance is set to the same value. Kojima does not disclose the determination for each virtual target primary of a target luminance value which can be realized by the corresponding real primaries. Virtual target primaries are not even discussed in Kojima.

Amended claim 1 is thus not rendered obvious by Kojima, even if the teachings of the references are combined (which is contested, as explained above).

Therefore it is submitted that amended claim 1 is non-obvious in view of the prior art.

Claims 3, 4, 7-18 and 21 are all claims depending on amended claim 1. These claims are thus also non-obvious.

- 3. Rejection of claims 19 and 20 under 35 USC § 103:

In the Office Action, page 7, point 5, claims 19 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Booth in view of Oguchi and further in view of Ohtsuka et al. (USPqPub 2003/0003544).

Both claims 19 and 20 are dependent on amended claim 1 and are thus also non-obvious for the reasons explained above.

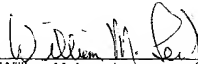
4. Conclusion

Applicants submit that the claims are in condition for allowance, and such action is requested.

An appropriate Petition for Extension of Time is also submitted herewith.

September 17, 2007

Respectfully submitted,

  
\_\_\_\_\_  
William M. Lee, Jr.  
Reg. No. 26,935  
Barnes & Thornburg LLP  
P.O. Box 2786  
Chicago, Illinois 60690-2786  
(312) 214-4800  
(312) 759-5646 (fax)